

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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INTEGRATED HEALTH SERVICES OF  
CLIFF MANOR, INC., et al.,

Plaintiffs-Counterclaim Defendants,

v.

THCI COMPANY LLC,

Defendant-Counterclaimant.

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Case No. 1:04-910-GMS

**REQUEST FOR ORAL ARGUMENT AND NOTICE OF COMPLETION OF BRIEFING**

In accordance with this Court's procedures and Local Rule 7.1.2, Defendant-Counterclaimant THCI Company LLC ("Defendant"), by and through its undersigned attorneys, hereby notifies the Court that briefing on Defendant's Motion for Preliminary Injunction with Request for Expedited Consideration and Hearing (the "Motion") [Docket No. 86] is complete.

Pursuant to Local Rule 7.1.4, Defendant respectfully requests that oral argument be held on the Motion at the Court's earliest convenience, because Defendant is being irreparably damaged daily by actions of Plaintiffs-Counterclaim-Defendants Integrated Health Services of Cliff Manor, Inc. and eight other subsidiaries<sup>1</sup> ("Plaintiffs") of IHS Long-Term Care, Inc.

On July 13, 2005, Defendant filed its Motion for Preliminary Injunction with Request for Expedited Consideration and Hearing [Docket No. 86]. Motion

On July 22, 2005, Plaintiffs-Counterclaim Defendants filed their Memorandum of Law in Opposition to Preliminary Injunction Motion [Docket No. 91].

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<sup>1</sup> Integrated Health Services at Riverbend, Inc.; Integrated Health Services at Somerset Valley, Inc.; Alpine Manor, Inc.; Briarcliff Nursing Home, Inc.; Integrated Health Group, Inc.; Spring Creek of IHS, Inc.; Firelands of IHS, Inc.; and Elm Creek of IHS, Inc.

On July 27, 2005, Defendant filed its Memorandum of Law in Further Support of its Motion for Preliminary Injunction and Request for Expedited Consideration and Hearing [Docket No. 93 (Docket No. 92 entered in error)].

All briefing related to the Motion has been completed. Defendant respectfully requests that the Court schedule oral argument either in person or by telephone at the soonest date and time possible to address the present Motion and related issues. Expedited consideration is requested due to the nature of the present dispute concerning Plaintiffs-Counterclaim Defendants' possession of Nine Facilities owned by Defendant and Plaintiffs-Counterclaim Defendants' failure and refusal to pay rent or vacate the Facilities.

Dated: July 27, 2005  
Wilmington, Delaware

**GREENBERG TRAURIG LLP**

By: 

Scott D. Cousins (No. 3079)  
Victoria W. Counihan (No. 3488)  
Dennis A. Meloro (No. 4435)  
The Brandywine Building  
1000 West Street, Suite 1540  
Wilmington, Delaware 19801  
Tel: (302) 661-7000  
Fax (302) 661-7360

-and-

**ARENT FOX PLLC**

Robert E. Grossman  
Michael S. Cryan  
Igor M. Tsibelman  
1675 Broadway  
New York, New York 10019  
Tel: (212) 484-3900  
Fax: (212) 484-3990

*Attorneys for Defendant-Counterclaimant THCI  
Company LLC*